

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	No. 16-cr-10305-NMG
)	
MARTIN GOTTESFELD)	

DEFENDANT’S MOTION FOR EXTENSION OF TIME TO FILE
POST-VERDICT MOTION FOR JUDGMENT OF ACQUITTAL UNDER FRCP 29(c)(1)
AND MOTION FOR NEW TRIAL UNDER FRCP 33(b)(2)

The defendant Martin Gottesfeld (“Mr. Gottesfeld”) moves this Honorable Court for an extension of the respective 14 day periods to file a post-verdict Motion for Judgment of Acquittal under FRCP 29(c)(1) and a Motion for New Trial Under FRCP 33(b)(2). This motion does not request any extension of time concerning Mr. Gottesfeld’s additional right to file a Motion for New Trial based on newly discovered evidence under FRCP 33(b)(1).

As grounds, counsel is unavailable from today August 5, 2018 through August 12, 2018. Counsel has previously informed the Court and the government of this unavailability. In light of this commitment, and in light of the attention counsel must pay to his other serious cases after Mr. Gottesfeld’s trial, the defense requests an extension to file any motions under FRCP 29(c)(1) and FRCP 33(b)(2) until September 7, 2018.

MARTIN GOTTESFELD

By his attorney:

/s/ David J. Grimaldi

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DATE: August 5, 2018

CERTIFICATE OF SERVICE

I, David J. Grimaldi, hereby certify that true copies of this motion were served on all registered participants in this matter via ECF this 5th day of August 2018.

/s/ David J. Grimaldi

David J. Grimaldi